

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

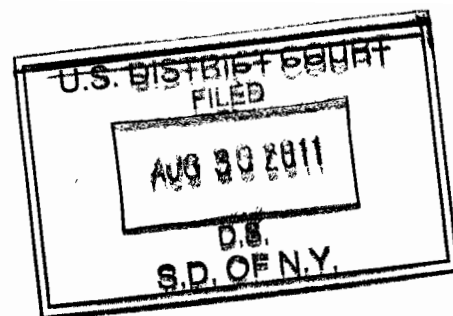
SEA TRADE MARITIME CORPORATION and
GEORGE PETERS,

Plaintiffs,

v.

STELIOS COUTSODONTIS, FRANCESCA
ELENI COUTSODONTIS, GENERAL
MARITIME ENTERPRISES CORPORATION,
ATTIKA INTERNATIONAL NAVIGATION SA,
IASON SHIPPING LTD., PINTO SHIPPING
LTD. and KARTERIA SHIPPING LTD.,

Defendants.



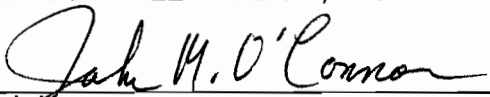
Civil Action No.: 09 CIV 00488 (BSJ)

NOTICE OF CROSS-APPEAL

PLEASE TAKE NOTICE that, based upon the Defendant Stelios Coutsodontis having filed a Notice of Appeal on August 23rd, 2011, the Plaintiffs Sea Trade Maritime Corporation and George Peters hereby cross-appeal to the United States Court of Appeals for the Second Circuit from an order and decision of Hon. Magistrate Judge Henry Pitman, rendered pursuant to an Order of Reference issued by Hon. Barbara S. Jones, United States District Judge for the Southern District of New York, and entered in this action on the 25th day of July, 2011, a copy of which is attached (the "Disqualification Order"). To the extent, if any, that the Defendant Coutsodontis is entitled to appeal from the Disqualification Order, which Plaintiffs dispute, Plaintiffs cross-appeal from that part of the Order that denied Plaintiffs' motion to immediately disqualify the entire Law Firm of PolesTublin from acting as counsel for Defendant Coutsodontis.

Dated: New York, New York
August 30, 2011

ANDERSON KILL & OLICK, P.C.

By: 
R. Mark Keenan
John O'Connor
1251 Avenue of the Americas
New York, New York 10020
Telephone: 212-278-1000

Counsel for the Plaintiffs:
Sea Trade Maritime Corporation and George
Peters